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Attorneys for *Plaintiff*, MARCO MILLA

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

MARCO MILLA an individual,

Plaintiff,

vs.

CITY OF LOS ANGELES a
municipal entity; LOS ANGELES
POLICE DEPARTMENT, a municipal
entity; COUNTY OF LOS ANGELES,
DETECTIVE R. ULLEY AND
DETECTIVE J. VANDER HORCK,
and DOES 1 through 100, inclusive,

Defendants.

Case No. CV-00134-FWS-MRW

Hon. Judge Fred W. Slaughter

Hon. Magistrate Judge Michael R.
Wilner

DECLARATION OF MARTIN
STANLEY RE REPORT ON OTHER
CASES

Trial

Date: 07/05/2023

Time: 08:30 AM

Courtroom: 10D, Santa Ana

Pre-Trial Conference

Date: 06/16/2023

Time: 09:00 AM

Courtroom: 10D, Santa Ana

1 I, MARTIN STANLEY, declare:

- 2 1. I am one of the attorneys for plaintiff and am admitted to practice before this
3 and other Courts. I have personal and firsthand knowledge of the facts herein
4 and, if called as a witness, could and would competently testify thereto.
5
- 6 2. Prior to this Court's response to the declaration I previously submitted and
7 immediately after the Marks court set the trial date, I met and conferred with
8 defense counsel in Marks and we were able to agree on a stipulation to
9 continue Marks with defense counsel agreeing to extend the 5 ½ year statute
10 an additional month.
11
- 12 3. The Marks court did not rule on the stipulation as of this past Friday. Hence I
13 prepared an ex parte application to continue Marks which included both the
14 stipulation and this Court's response to my last declaration. That worked.
15 When we appeared today for trial the Marks court granted our ex parte and
16 continued the Marks trial to September 26, 2023.
17
- 18 4. **Issues requested to be discussed at upcoming pre-trial conference.** I have
19 met and conferred further with defense counsel on the issues of qualified
20 immunity and the presumption of prosecutorial independence and have filed a
21 brief with this Court previously. If counsel are unable to resolve these issues,
22 Plaintiff respectfully requests that the Court discuss these issues with counsel
23 at the pretrial this coming Friday.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 7th day of June, 2023, at Santa Monica, California.

3
4 By: /s/ Martin Stanley
5 MARTIN STANLEY, ESQ.
6 Attorneys for Plaintiff,
7 MARCO MILLA
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 100 Wilshire Blvd, Suite 700, Santa Monica, California 90401.

On June 7, **2023**, I served the foregoing document(s) on the interested parties in this action by email as follows:

Attorney for Defendants:

KEVIN GILBERT

Email: kgilbert@ohhlegal.com

BY ELECTRONIC DELIVERY DUE TO COVID-19

☒ STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **June 7, 2023**, at Santa Monica, California

/s/ MARTIN STANLEY

Martin Stanley